

# EXHIBIT F

David J. Boshea – January 29, 2024

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

DAVID J. BOSHEA,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. 1:21-CV-00309-ELH
	)	
COMPASS MARKETING, INC.,	)	
	)	
Defendant.	)	
	)	

The videotaped deposition of DAVID J. BOSHEA, called by the Defendant for examination, pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Noreen E. Resendez, Registered Professional Reporter and Notary Public within and for the County of DuPage and State of Illinois, at 111 East Wacker Drive, Suite 2600, Chicago, Illinois, commencing at the hour of 9:44 a.m. on Monday, January 29, 2024.

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1                   A P P E A R A N C E S:

2                   JORDAN & ZITO, LLC, By  
3                   MR. GREGORY J. JORDAN  
4                   350 North LaSalle Street, Suite 1100  
5                   Chicago, Illinois 60654  
6                   312.489.8174  
7                   gjordan@jz-llc.com

8                   -and-

9                   GILBERT EMPLOYMENT LAW, PC  
10                  MR. THOMAS J. GAGLIARDO (remote attendance)  
11                  1100 Wayne Avenue, Suite 900  
12                  Silver Spring, Maryland 20910  
13                  888.676.8096  
14                  tgagliardo@gelawyer.com

15                  On behalf of the Plaintiff;

16                  KAGAN STERN MARINELLO & BEARD, LLC, By  
17                  MR. STEPHEN B. STERN  
18                  MS. SHANNON M. HAYDEN (remote attendance)  
19                  238 West Street  
20                  Annapolis, Maryland 21401  
21                  410.216.7900  
22                  stern@kaganstern.com

23                  On behalf of the Defendant.

24                   ALSO PRESENT:

                  Mr. Brian P. Bruce, Sr., videographer  
                  Mr. John White, Compass Marketing (via remote)  
                  Mr. Ronald Bateman, Compass Marketing (via remote)

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1 (Deposition Exhibit No. 51 was  
2 introduced to the witness.)

3 BY MR. STERN:

4 Q. Showing you what's been marked  
5 Exhibit 51. It's an e-mail from you to Mr. Jordan  
6 dated January 19, 2024 at 8:33 a.m.

7 Do you see that?

8 A. What is the time?

9 Q. January 19th, 2024 at 8:33 a.m.

10 A. Yes, I see it.

11 Q. And you were forwarding to Mr. Jordan  
12 an e-mail that you sent to Michael White and  
13 Daniel White dated September 12th, 2023, at  
14 7:33 a.m., right?

15 A. Correct.

16 Q. And the subject of that e-mail was  
17 "revision trial prep."

18 You see that?

19 A. For myself, yes.

20 Q. So you sent your trial prep materials  
21 to Daniel White and Michael White, right?

22 A. Yes.

23 Q. Why were you sending them trial prep  
24 materials for this case?

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1                   A.     They're friends and they're smart and  
2                   they know what is going on.

3                   Q.     Did they make any suggestions to you  
4                   about --

5                   A.     No.

6                   Q.     No? Were you seeking your input?

7                   MR. JORDAN: David, let him finish his  
8                   question.

9                   THE WITNESS: Oh, sorry, sorry.

10                  BY MR. STERN:

11                  Q.     Were you seeking their input?

12                  A.     Yes.

13                  Q.     So what did you ask them about your  
14                  trial prep?

15                  A.     If they had anything they could help me  
16                  add, am I missing anything.

17                  Q.     Well, this says revision trial prep.  
18                  Did you send them an earlier draft of it?

19                  A.     I don't remember.

20                  Q.     You don't remember if you sent them an  
21                  earlier draft or not?

22                  A.     I don't.

23                  Q.     Looking at this, does this remind you  
24                  that this was a revised version of it?

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1 A. Let me look at it.

2 Yes, I did want to add some spelling.

3 Q. You were checking with them on the  
4 spelling of things?

5 A. No. I had some wrong spellings. So I  
6 must have sent them the one without the right  
7 spelling and then sent them the one with the right  
8 spelling.

9 Q. So the only revisions you made were  
10 spelling changes?

11 A. I believe so.

12 Q. That was it?

13 A. I believe, yes.

14 Q. You didn't ask for any other input from  
15 them?

16 A. No.

17 Q. No what?

18 A. I did not. Just the one time.

19 (Deposition Exhibit No. 52 was  
20 introduced to the witness.)

21 BY MR. STERN:

22 Q. Showing you what's marked as  
23 Exhibit 52. It's an e-mail you sent to Mr. Jordan  
24 dated January 19, 2024 at 8:16 a.m. in which you